

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

STATE OF WASHINGTON,

Plaintiff,

V.

THE GEO GROUP, INC., a Florida  
corporation,

Defendant.

Case No. 17-cv-05806-RJB

UGOCHUKWU GOODLUCK  
NWAUZOR on behalf of all those  
similarly situated, and FERNANDO  
AGUIRRE-URBINA, individually,

Plaintiffs,

V.

THE GEO GROUP, INC., a Florida  
corporation,

Defendant.

Case No. 17-cv-05769-RJB

DECLARATION OF JAMAL N.  
WHITEHEAD IN SUPPORT OF  
PLAINTIFFS' RESPONSE TO  
GEO'S SUBMISSION  
REGARDING JUDICIAL  
NOTICE OF THE UNITED  
STATES' STATEMENT OF  
INTEREST [DKT. 290]

I, Jamal N. Whitehead, declare as follows:

1. I am over the age of eighteen, competent to testify in this matter, and do so  
based on personal knowledge.

WHITEHEAD DECL. IN SUPPORT  
OF PLTFS.' RESP. TO GEO'S SUB.  
RE: JUDICIAL NOTICE  
(Nos. 17-cv-05769/05806-RJB) - 1

SCHROETER GOLDMARK & BENDER  
401 Union Street • Suite 3400 • Seattle, WA 98101  
Phone (206) 622-8000 • Fax (206) 682-2305

3. Attached as Exhibit B is a true and correct copy of excerpts from the Rule 30(b)(6) deposition of GEO dated December 10, 2019, including the case caption and the court reporter's signature page. GEO designated Bruce Scott as its testifying agent for purposes of the deposition.

Executed in Seattle, Washington, this 25th day of October, 2021.

Jamal N. Whitehead, WSBA #39818

**CERTIFICATE OF SERVICE**

I hereby certify that on October 25, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Devin T. Theriot-Orr  
OPEN SKY LAW, PLLC  
20415 – 72<sup>nd</sup> Avenue South, Suite 110  
Kent, WA 98032  
[devin@opensky.law](mailto:devin@opensky.law)  
*Attorney for Plaintiff*

R. Andrew Free  
THE LAW OFFICE OF R. ANDREW FREE  
PO Box 90568  
Nashville, TN 37209  
[andrew@immigrantcivilrights.com](mailto:andrew@immigrantcivilrights.com)  
*Attorney for Plaintiff*

Meena Menter  
MENTER IMMIGRATION LAW PLLC  
8201 – 164th Avenue NE, Suite 200  
Redmond, WA 98052  
[meena@meenamenter.com](mailto:meena@meenamenter.com)  
*Attorney for Plaintiff*

Joan K. Mell  
III BRANCHES LAW, PLLC  
1019 Regents Boulevard, Suite 204  
Fircrest, WA 98466  
[joan@3brancheslaw.com](mailto:joan@3brancheslaw.com)  
*Attorney for Defendant*

Adrienne Scheffey  
AKERMAN LLP  
1900 Sixteenth Street, Suite 1700  
Denver, CO 80202  
[adrienne.scheffey@akerman.com](mailto:adrienne.scheffey@akerman.com)  
*Attorneys for Defendant*

Al Roundtree  
FOX ROTHSCHILD LLP (Seattle)  
1001 Fourth Ave, Ste 4500  
Seattle, WA 98154  
[aroundtree@foxrothschild.com](mailto:aroundtree@foxrothschild.com)  
*Attorneys for Defendant*

Jacqueline M. Arango  
AKERMAN LLP  
98 Southeast Seventh Street, Suite 1100  
Miami, Florida 33131  
[jacqueline.arango@akerman.com](mailto:jacqueline.arango@akerman.com)  
*Attorneys for Defendant*

Wayne H. Calabrese  
Joseph Negron Jr.  
The GEO Group, Inc.  
4955 Technology Way  
Boca Raton, Florida 33431  
[wcalabrese@geogroup.com](mailto:wcalabrese@geogroup.com)  
[jnegron@geogroup.com](mailto:jnegron@geogroup.com)  
*Defendant*

DATED at Seattle, Washington this 25th day of October, 2021

*s/ Jamal Whitehead*

Jamal Whitehead  
Schroeter Goldmark & Bender  
810 Third Avenue, Suite 500  
Seattle, WA 98104  
Tel: (206) 622-8000  
[whitehead@sgb-law.com](mailto:whitehead@sgb-law.com)